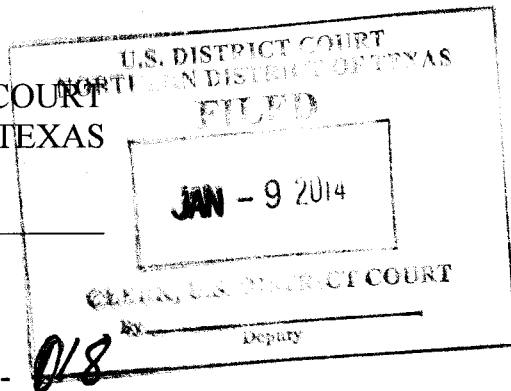


IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION



UNITED STATES OF AMERICA §

v. §

No. 4:14-MJ-

IGNACIO SALCIDO (1) §

SERGIO SALCIDO ARAGON (2) §

CARLOS PLAZOLA (3) §

CRIMINAL COMPLAINT

Conspiracy to Possess a Controlled Substance with Intent to Distribute

Beginning on or before June 1, 2012, and continuing until on or about November 14, 2012, in the Fort Worth Division of the Northern District of Texas, defendants **Ignacio Salcido**, **Sergio Salcido Aragon**, **Carlos Plazola**, and others known and unknown, did knowingly and intentionally combine, conspire, confederate, and agree to engage in conduct in violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Cocaine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

I am employed as an Investigator with the Tarrant County District Attorney's Office and I am sworn as a Task Force Officer with the U.S. Drug Enforcement Administration in Fort Worth, Texas. I am an investigative or law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, who is authorized by law to conduct investigations and make arrests for offenses enumerated in Section 2516 of Title 18, United States Code. I have been assigned as a Narcotics Investigator for over fifteen years. I have been assigned as a Task Force Officer with the U.S. Drug Enforcement Administration, Fort Worth, Texas since 1999.

I have previously investigated violations of Title 21, United States Code, Section 841(a)(1); Title 21, United States Code, Section 846; Title 21, United States Code, Section 848; Title 21, United States Code, Section 843(b); and Title 18, United States Code, Section 1956.

The Houston Police Department have been utilizing a Confidential Source (CS) that has provided them with credible information. I am aware of the CS's reliability as a result of the CS having provided detailed information relating to narcotic distribution activity that Houston Police have found to be true and accurate. The CS has also displayed his/her ability to accurately identify substances as being Cocaine, with law enforcement personnel later seizing the substances and through chemical testing, finding them to be Cocaine.

On June 3, 2012, the CS traveled to the Dallas/Fort Worth, Texas area to negotiate a purchase of multiple kilograms of cocaine. The CS travelled with Carlos Plazola to the Dallas area and met with Ignacio Salcido. The CS stated that Ignacio Salcido drove Carlos Plazola and the CS to a ranch located in Burleson, Texas. Once at the ranch, Ignacio Salcido, Carlos Plazola, and the CS entered an out building away from the house. Ignacio Salcido left Carlos Plazola and the CS in the out building and left the building. Approximately 20 minutes later, Ignacio Salcido returned with two kilograms of cocaine. Ignacio Salcido told the CS that the kilos would cost \$25,000.00 apiece. Ignacio Salcido told the CS that they, meaning his organization, could start the CS out with five to ten kilograms of cocaine at a time and increase the amount as their confidence level grew.

On June 8, 2012, a meeting was set up between the CS, Carlos Plazola, Ignacio Salcido, Sergio Salcido Aragon, and others unknown to investigators in Houston, Texas. Prior to the meeting, investigators with the Houston Police department met with the CS and gave the CS a digital recorder to record the meeting. The CS went to the meeting location where he met with Carlos Plazola, Ignacio Salcido, and Sergio Salcido Aragon. During the meeting, the group discussed delivering Cocaine to the CS. The CS agreed to pay \$25,000.00 per kilogram of cocaine in the Dallas, Texas area for 10 kilograms of cocaine at a later date.

During the next several months the negotiations continued between the CS, Carlos Plazola, Ignacio Salcido, Sergio Salcido Aragon, for the purchase of 10 kilograms of cocaine in the Dallas/Fort Worth, Texas area. During this time frame there were numerous phone calls recorded in reference to the negotiations.

In November 2012, it was decided that the transaction would take place in the Fort Worth, Texas area. On November 14, 2012, the CS travelled to Fort Worth, Texas. Once in Fort Worth, Texas the CS made a recorded telephone call to Ignacio Salcido who told the CS to meet him at the Jack in the Box located at Interstate 20 and Forest Hills Drive in South Fort Worth, Texas. Salcido told the CS that he, Salcido, wanted to do the cocaine transaction at his place of business. Salcido told the CS to wait and he would meet with the CS again and take him/her to the business to conduct the transaction. Salcido then left the area.

On this same date, approximately one hour later Salcido returned to the Jack in the Box. At this time Salcido told the CS to follow him. The CS followed Salcido to Whitmore and Sons, located at 2851 West Euless Boulevard, Euless, Texas. Salcido told the CS that the business was where the transaction would take place and that he would call him later when everything was ready.

Later that same evening, Salcido called the CS and advised the CS that he wanted to see the money for the ten kilograms of cocaine and the CS agreed. Salcido went to the Jack in the Box, located at the corner of Raider Drive and West Euless Boulevard, Euless, Texas. Salcido met with the CS and an undercover Houston Police Officer who showed Salcido the US Currency to purchase the cocaine. Salcido and the CS then departed the Jack in the Box and returned to Whitmore and Sons. Salcido entered the business and then showed the CS approximately 10 kilograms of cocaine. Salcido then provided the CS a small sample of the cocaine.

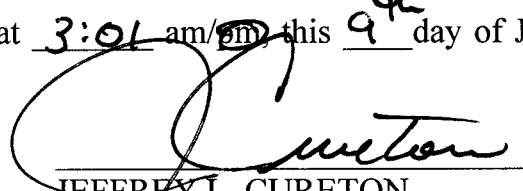
On this same date, approximately one hour later, Salcido was seen turning off the lights to the business and preparing to leave. At this time DPS Troopers approached Salcido. The Troopers received consent to search the business from Salcido. Upon a search of the business, 10 kilograms of a white powder substance believed to be cocaine were found and seized.

The ten kilograms of white powdery substance were later submitted to the Drug Enforcement Administration lab. The lab conducted tests on the substance and found that the substance was in fact cocaine with a weight of approximately 10,000 grams.

Although I have not listed all the facts regarding this conspiracy, I believe that the facts stated here establish probable cause that the defendants have committed a violation of 21 U.S.C. §§ 841(a)(1) & (b)(1)(C), namely to possess with intent to distribute a mixture and substance containing a detectable amount of Cocaine, a schedule II controlled substance, in violation of 21 U.S.C. § 846.


Task Force Officer Kevin K. Brown
Drug Enforcement Administration

SWORN AND SUBSCRIBED before me, at 3:01 am/pm this 9th day of January, 2014.


JEFFREY L. CURETON
United States Magistrate Judge